

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

WAYNE DORAN, ET AL. [AS IT RELATES TO  
PLAINTIFF MARIA ZACKOWSKI]

Plaintiff,

- vs -

C.R. BARD INCORPORATED and  
BARD PERIPHERAL VASCULAR INCORPORATED,

Case No.

5:19-CV-1126 (GTS/ML)

Defendants.

**JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

Plaintiff, Maria Zackowski, and Defendants, C.R. Bard Incorporated and Bard Peripheral Vascular Incorporated (collectively, the “Parties”), by and through their respective undersigned counsel, and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, hereby stipulate to a dismissal of all of the claims in this action without prejudice as to Defendants, C.R. Bard Incorporated and Bard Peripheral Vascular Incorporated. The Parties shall bear their own attorneys’ fees, costs, and expenses, except as otherwise provided for in the Parties’ settlement agreement.

Dated: July 13, 2020

Respectfully submitted,

Fleming, Nolen & Jez, L.L.P

By: /s/ Rand Patrick Nolen

Rand Patrick Nolen  
2800 Post Oak Blvd.  
Suite 4000  
Houston, TX 77056  
Tel: (713) 621-7944  
Email: rand\_nolen@fleming-law.com

*Attorney for Plaintiff*

NELSON MULLINS RILEY &  
SCARBOROUGH LLP

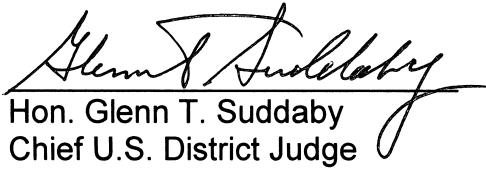
By: /s/ James F. Rogers

James F. Rogers, Esq. (*pro hac*)  
1320 Main Street, 17th Floor  
Columbia, SC 29201  
Tel: (803) 255-9489  
Email: jim.rogers@nelsonmullins.com

NIXON PEABODY LLP  
Vivian M. Quinn, Esq.  
Bar Roll No. 509083  
40 Fountain Plaza, Suite 500  
Buffalo, New York 14202  
Tel: (716) 853-8100  
Email: vquinn@nixonpeabody.com

*Attorneys for Defendants C.R. Bard  
Incorporated and Bard Peripheral Vascular  
Incorporated*

IT IS SO ORDERED:

  
Hon. Glenn T. Suddaby  
Chief U.S. District Judge

Dated: 7/14/2020  
Syracuse, NY